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Attorney for Petitioner

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official
capacity as President of the United
States; William P. JOYCE, in his
official capacity as Acting Field Office
Director of New York, Immigration and
Customs Enforcement; Caleb
VITELLO, Acting Director, U.S.
Immigration and Customs Enforcement;
Kristi NOEM, in her official capacity as
Secretary of the United States
Department of Homeland Security;
Marco RUBIO, in his official capacity
as Secretary of State; and Pamela
BONDI, in her official capacity as
Attorney General, U.S. Department of
Justice,

Respondents.

Case No.: 2:25-cv-01963
(MEF)(MAH)

**CERTIFICATION OF JEANNE
LOCICERO IN SUPPORT OF
APPLICATION OF MOLLY
BIKLEN TO APPEAR PRO HAC
VICE**

I, Jeanne LoCicero, certify as follows:

1. I am Legal Director for the American Civil Liberties Union of New Jersey Foundation and counsel for Petitioner in this case. I am admitted to practice before this Court and licensed to practice law in the State of New Jersey.

2. I am a member in good standing of the Bar of the State of New Jersey (Attorney ID No. 024052000) and the United States District Court for the District of New Jersey. I have never been disciplined by any Court before which I have appeared, and I have no disciplinary proceedings pending against me in any jurisdiction.

3. I respectfully submit this certification in support of Molly Biklen, Interim Legal Director at the New York Civil Liberties Union Foundation, and a member in good standing of the New York State Bar, to appear as counsel for Petitioner *pro hac vice* for all purposes in this action. Ms. Biklen's certification demonstrates her qualifications and credentials for admission *pro hac vice*.

4. I will be responsible for the conduct of Ms. Biklen in this case.

5. Pursuant to Local Civil Rule 101.1(c)(4), I, or other co-counsel who are admitted to the District of New Jersey will sign all pleadings, moving papers, and other submissions filed in this case and enter appearances on behalf of Petitioner.

6. I have read and will comply with Local Civil Rule 101.1(c) of the United States District Court for the District of New Jersey.

WHEREFORE, Petitioner respectfully requests that this Court enter the proposed order submitted herewith approving the admission *pro hac vice* of Ms. Biklen.

I hereby certify under penalty of perjury that the foregoing statements are true and correct.

Dated: March 21, 2025

s/Jeanne LoCicero
Jeanne LoCicero